Exhibit E, Figure 13 is an allocations study of channel 291A at Sulphur. It is depicted at reference coordinates which produce the required 70 dBu service to all of Sulphur. The allocation study depicts that the channel requires a site restriction of 12.88 kilometers (@ 0°) north. It should be noted that the reference coordinates depict a mutual exclusive short spacing to the proposed allocation of channel 291A at Pauls Valley, OK.

Exhibit E, Figure 14 is a computer generated map depicting the gain and loss area of the allocation of channel 291A at Sulphur in comparison to the licensed facility of KFXT. The study depicts that presently, as a 3 KW class A, KFXT provides a 60 dBu service to 1,672.40 square kilometers. A maximum class A (6 KW @ 100 meters antenna HAAT) provides service to 2,516.1 square kilometers. This is a land area gain of 843.70 kilometers.

In addition, Exhibit E, Figure 15 is a population comparison between KFXT present and proposed. According to the study, KFXT presently services 16,897 persons with a 60 dBu service while a maximum class A on channel 291A will serve 32,132 persons. This is a gain of 15,235 persons.

Exhibit E, Figure 16 is a US Census Bureau Tiger map with the proposed channel 291A allocation coordinates plotted by computer. A maximum class A 70 dBu contour (16.2 KM) was added to depict that the allocation of this channel to Sulphur would provide the required 70 dBu service to 100% of the community. As shown by the exhibit, the required

service is provided. Exhibit E, Figure 17 is a map depicting a minimum remaining services after the KFXT site relocation. Figure 17B is a list of the stations included in the study. Each facility is numbered with the same number appearing on its contour in Figure 17. As depicted by the study, no areas of the KPXI loss area will be left with less than 5 services.

## SUBSTITUTING CHANNEL 283A FOR CHANNEL 291A @ PAULS VALLEY

The petitioner for a new FM service at Pauls Valley, Tom Stamper, requested channel 291A. However, additional allocation studies have determined that channel 283A also meets the spacing requirements for allocation to Pauls Valley. The Joint Petitioners are proposing that channel 283A be considered for channel 291A. The allocation site will have a 1.42 kilometer restriction. It assumes the KWSH CP has not been exercised and the community of Pauls Valley reference coordinates are used to determine the small site restriction. No 70 dBu contour community boundaries maps are included since there is only a 1.42 kilometers site restriction. See Exhibit E, Figure 18

## KORQ CH 264C CHANNEL CHANGE TO CH 263C

Dynamic Broadcasting, Inc., the license of KORQ proposes to delete channel 264C at Abilene and substitute first adjacent channel 263C with a 7.55 kilometer site change. The upgrade of KRJT at the Joint Petitioners requested site creates a short space to KORQ on channel 264C

of 24.13 kilometers. See Exhibit E, Figure 19 for KORQ spacing on channel 263C at the present licensed site. this allocation clears the KRJT upgrade, there is short KMMX discussion spacing to KMMX Tahoka (see However, when channel 263C is substituted at a site which clears KACU (IF) Abilene, KYZZ (261C2) San Angelo, and KMMX (262C1) Tahoka, all Texas, the KORQ spacing clears the KRJT upgrade coordinates by 22.34 kilometers. The allocation of channel 263C at Abilene is made possible by the licensee of KMMX Tahoka having filed a licensed application for its new site.

Exhibit E, Figure 20 is an allocations study depicting separations to all pertinent FM facilities for the substitution of channel 263C for channel 264C at Abilene. The study considers the proposed 7.55 kilometer KORQ site change.

Exhibit E, figure 21 is a copy of a service contour map depicting the proposed KORQ 70 dBu and the community boundaries of Abilene. It demonstrates that the pending allocation provides the required 70 dBu service to 100% of the community of license. Exhibit E, Figure 22 is a computer generated map depicting the present and proposed 60 dBu contours of KORQ. The gain area is shaded.

Presently KORQ provides a 60 dBu service to a land area of 19,904.7 square kilometers and 195,558 persons, while the application site provides the same service to 26,475.0 square kilometers and 219,726 persons. This is a land area

gain of 6,570.30 square kilometers and 24,168 persons. See Exhibit E, figure 23.

## **SUMMARY**

Technically the KRJT Counterproposal can be summarized as follows:

db lollowo,	First Loçal	Land Area $\frac{1}{2}$	Persons Served $\frac{1}{2}$		
Call Sign	<u>Service \2</u>	Gain (loss)	Gain (Loss)		
KRJT	yes	21,838.8 (G)	2,155,202 (G)		
KPXI	yes	7,900.4 (L)	79 <b>,</b> 279 (G)		
KFXT	no	843.7 (G)	15,235 (G)		
KORQ	no	6,570.3 (G)	24,168 (G)		

Net Gains

2 New local Services
 Land Area Net Gain 21,352.4
 Persons Served Net Gain 2,273,884

### CONCLUSION

Exhibit E, Figure 21 is an allocations study using the instant counterproposal allocation coordinates for KRJT at Highland Village. This exhibit differs from Exhibit E, figure 1 in depicting the allocation of channel 264C at Highland Village after all of the proposed changes are made. In this exhibit, all pertinent facilities are depicted at their proposed class, channel and reference coordinates. If the instant counterproposal is allocated as it is submitted, technically it will contribute to the maximum utilization of the spectrum.

### ENGINEERING CERTIFICATION

STATE OF ALABAMA
BUTLER COUNTY

Paul Reynolds declares the following:

- \* That he has completed undergraduate studies in the field of communications at the University of Southern Mississippi.
- \* That he has completed course requirements for a Masters Degree in communications at the University of Alabama.
- \* That he has completed basic electronics at DeVry Technical Institute.
- \* That he has been operating as an independent communications consultant since 1980.
- \* That he is familiar with the Commission's Rules and Regulations.
- \* That the engineering information for the instant Joint Petitioners Counterproposal in MM Docket 97-84 was prepared by me or under my direct supervision.
- \* That all information presented is believed to be true and correct and in full compliance of the technical standards contained in the Commission's Rules and Regulations in affect at the time of the applicant's filing date.

Paul Revnolds

REYNOLDS TECHNICAL ASSOCIATES 301 Cedar Street Suite 4 Greenville, AL 36037

(334) 382-3239

Sworn to and subscribed before, this /9 day of hpril, 1997.

My commission expires 7-/5-2000

John K. Reynolds

In Support of a

# COUNTERPROPOSAL

Channel 291A, Pauls Valley, OK
MM DOCKET 97-84, RM-9021
DYNAMIC BROADCASTING, INC.
EAST TEXAS BROADCASTING, INC.
BOWIE-NOCONA BROADCASTING COMPANY, INC.

# KRJT UPGRADE ALLOCATION STUDY - HIGHLAND VILLAGE

	ING 8	PECTRUM C	HANGES N		RY FOR	KRJT UPO		CLASS C	]
25 03 N				Class				Search	
31 34 W	•		Current Channel		_	-		04-15-	-97
Call	Ch#	City		State	Bear'	Dist'	R'qrd	Margir	1
Reference	Coordina	<b>Highland</b> ates: : 33-05-17	Village	TX	129.8	57.08			
		: 97-03-20							
KRJTFM 2 Of No Cond Present Li	ern	Bowie		TX	312.9	37.12	237.0	-199.88	*
Of Concerr	KPXI Cla		<b>easant</b> Inge in Communi	<b>TX</b>	100.1	216.33	290.0	-73.67	*
See KPXI E	Below								
KFXT.C 2 Of Concern Present CF Being Fort	n P (Class	_		OK	14.8	117.32	176.0	-58.68	*
Of Concern Substitute (Ch 291A)	e Channe	•		OK	22.0	135.42	165.0	-29.58	*
KORQFM 2 Of Concern Change to with New A See KORQ	n Ch 263C Antenna	•		TX	245.2	265.87	290.0	-24.13	*
	266C 262C	Oklahoma Dallas Dallas Dallas	City	OK TX TX TX	0.9 150.5 150.5 150.3	240.96 105.54 106.00 106.31	241.0 105.0 105.0 105.0	-0.04 0.54 1.00 1.31	*

Continued on next page



# KRJT UPGRADE ALLOCATION STUDY - HIGHLAND VILLAGE

	[DEPIC!	TING 8	PECTRUM C	HANGES N	ECESSA	RY FOR	KRJT UPO	RADE TO	CLASS C]
33	25 03	N.			Class	-			Search Date
97	31 34	W.		Current	rules	spacin	gs		04-15-97
				Channel	264 -	100.7	MHz —		
	Call	Ch#	City		State	Bear'	Dist'	R'qrd	Margin
	KPXI	264C2	Overton		TX	115.0	253.15	249.0	4.15 *
	Of No Co	ncern							
	Proposed	KPXI Clas	s Change & Cha	nge in Communi	ity				
	of Licer	seto Overt	on, TX						
	Referenc	e Coordina	tes:						
	North	h Latitude:	32-27-09						
	West	Longitude	: 95-04-23						
	KORQFM	263C	Abilene		TX	243.7	263.34	290.0	22.34 *
	Of No Co								
	New Char	nel & Site	: Change						
	Proposed	d in Instar	it Counterpropo	sal					
	Referenc	ce Coordina	ites:						
	Nort	h Latitude	: 32-21-57						
	West	Longitude	: 100-02-58						
	KIXCFM	265C3	Quanah		ТX	293.7	218.68	176.0	42.68
	KASE	264C	Austin		ТX	184.3	344.19	290.0	54.19
	KASE	264C	Austin		TX	184.3	344.50	290.0	54.50
	KERA	211C	Dallas		ТX	150.1	107.33	48.0	59.33

In Support of a

# **COUNTERPROPOSAL**

Channel 291A, Pauls Valley, OK
MM DOCKET 97-84, RM-9021
DYNAMIC BROADCASTING, INC.
EAST TEXAS BROADCASTING, INC.
BOWIE-NOCONA BROADCASTING COMPANY, INC.

# KRJT UPGRADE ALLOCATION STUDY - BOWIE

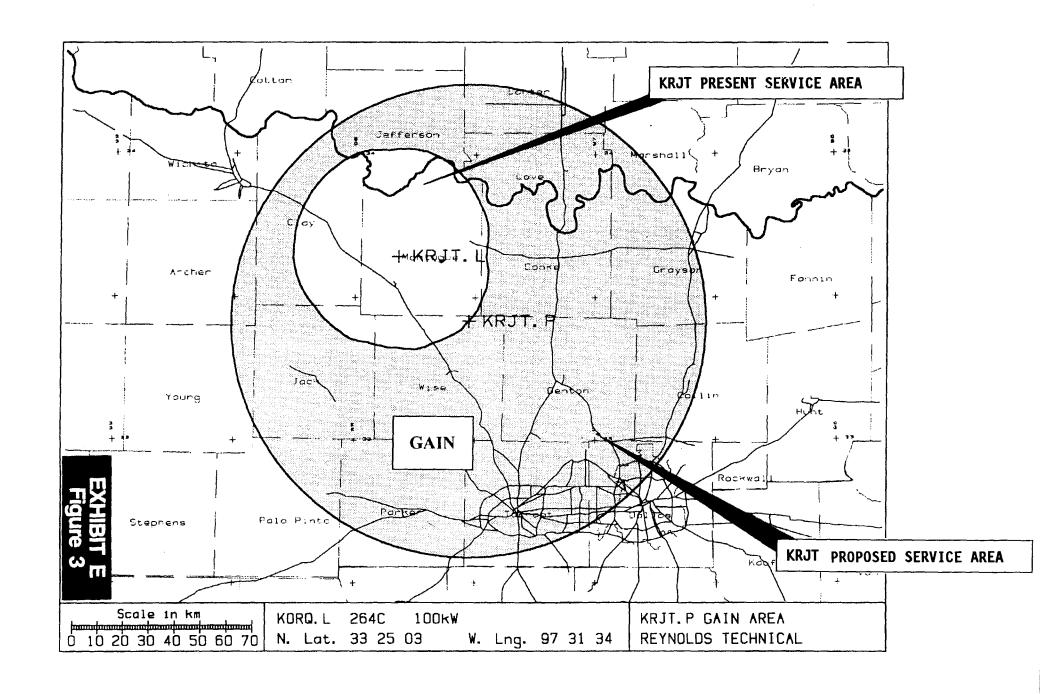
[DEPICTING	SPECTRUM CHANGES			KRJT UPG		CLASS C]
33 25 03 N.		Class				Search Date
97 31 34 W.		nt rules el 264 -		gs MHz ———		04-15-97
Call Ch		State		Dist'	R'qrd	Margin
		TX	280.0	33.52		
KRJTFM 2640 Of No Concern Present Licens	C3 Bowie ed Site of KRJT	TX	312.9	37.12	237.0	-199.88 *
KPXI 2640 Of Concern Proposed KPXI of Licenseto C See KPXI Below	Class Change & Change in Converton, TX		100.1	216.33	290.0	-73.67 <b>*</b>
KFXT.C 2650 Of Concern Present CP (C) Being Forfited	lass C3)	OK	14.8	117.32	176.0	-58.68 *
KFXT 265.  Of Concern Substitute Cha (Ch 291A) Prop	unnel	OK	22.0	135.42	165.0	-29 <b>.</b> 58 *
KOROFM 264  Of Concern Change to Ch 2 with New Anter See KORO Below	263C Proposed nna Site	TX	245.2	265.87	290.0	-24.13 *
KATTFM 263 WRR 266 KRBV 262 KRBV.C 262	C Dallas C Dallas	OK TX TX TX	0.9 150.5 150.5 150.3	240.96 105.54 106.00 106.31	105.0	-0.04 * 0.54 * 1.00 * 1.31 *

Continued on next page



# KRJT UPGRADE ALLOCATION STUDY - BOWIE

•		<u>KKJI UP</u> PECTRUM C			RY FOR		<u>)WIE</u> BRADE TO	CLASS C]
33 25 03 97 31 34			Current Channel		spacin	gs MHz		Search Date 04-15-97
Call	Ch#	City	Chamer	State		Dist'	R'qrd	Margin
of Lice Referenc Nort		ites: : 32-27-09	nge in Commun	<b>TX</b>	115.0	253.15	249.0	4.15 *
Propose Referen Nort	oncern nnel & Site d in Instar ce Coordina :h Latitude	nt Counterpropo ates:	sal	TX	243.7	263.34	290.0	22.34 *
KIXCFM	265C3	Quanah		ТX	293.7	218.68	176.0	42.68
KASE	264C	Austin		ТX	184.3	344.19	290.0	54.19
KASE	264C	Austin		ТX	184.3	344.50	290.0	54.50
KERA	211C	Dallas		TX	150.1	107.33	48.0	59.33



#### (Present) KRJT POP COUNTS

	I	County	Co. Pop.	percent	Pop.	Total	
588	TX	Cooke	30777	4	1231		
658	TX	Jack	6981	12	838	ı	
787	TX	Wise	34679	17	5895	ı	
578	TX	Clay	10024	42	4210	•	
708	TX	Montague	17274	94	16238	28,412	TX population
799	OK	Jefferson	7010	18	1262	1,262	OK population

29,674 KRJT (Lic)

#### KRJT POP COUNTS (Proposed)

S	I	County	Co. Pop.	percent	Pop.	<u>Total</u>	
588	TX	Cooke	30777	4	1231		
544	TX	Archer	7973	14	1116		
790	TX	Young	18126	16	2900		
582	TX	Collin	264036	29	76570		
596	TX	Dallas	1852810	32	592899	,	
721	TX	Palo Pinto	25055	35	8769		
630	TX	Grayson	95021	61	57963		
759	TX	Tarrant	1170103	87	1017990		
578	TX	Clay	10024	89	8921		
723	TX	Parker	64785	92	59602	!	
658	TX	Jack	6981	100	6981		
787	TX	Wise	34679	100	34679	)	
708	TX	Montague	17274	100	17274		
601	TX	Denton	273525	100	273525	2,160,420	TX population
801	OK	Marshall	10829	8	866	<b>)</b>	•
799	OK	Jefferson	7010	12	841		
795	OK	Carter	42919	34	14592	2	
800	OK	Love	8157	' 100	8157	24456	<b>OK</b> population

2,184,876 KRJT (Alloc)

License (current) 29,674

2,155,202 Diff.

Both cover

29,674

(GAIN)

Loss within Lic.

NONE

New (gain)

2,155,202

Land Area - Square Kilometers

Present

4,636.2

Proposed -

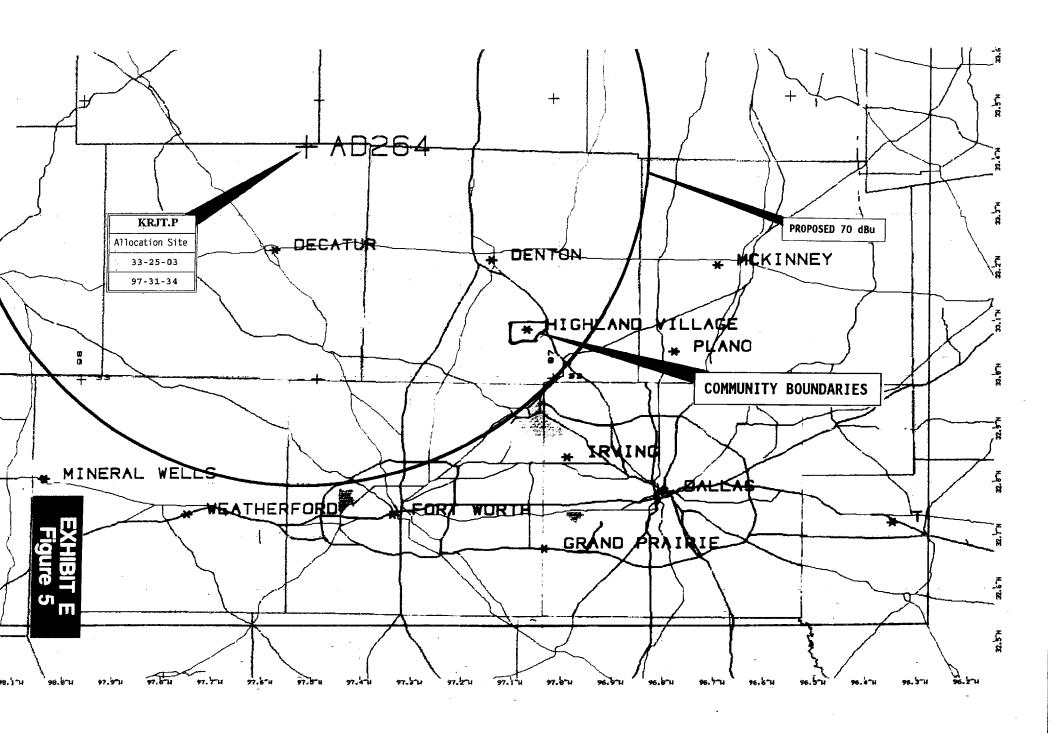
26,475.0

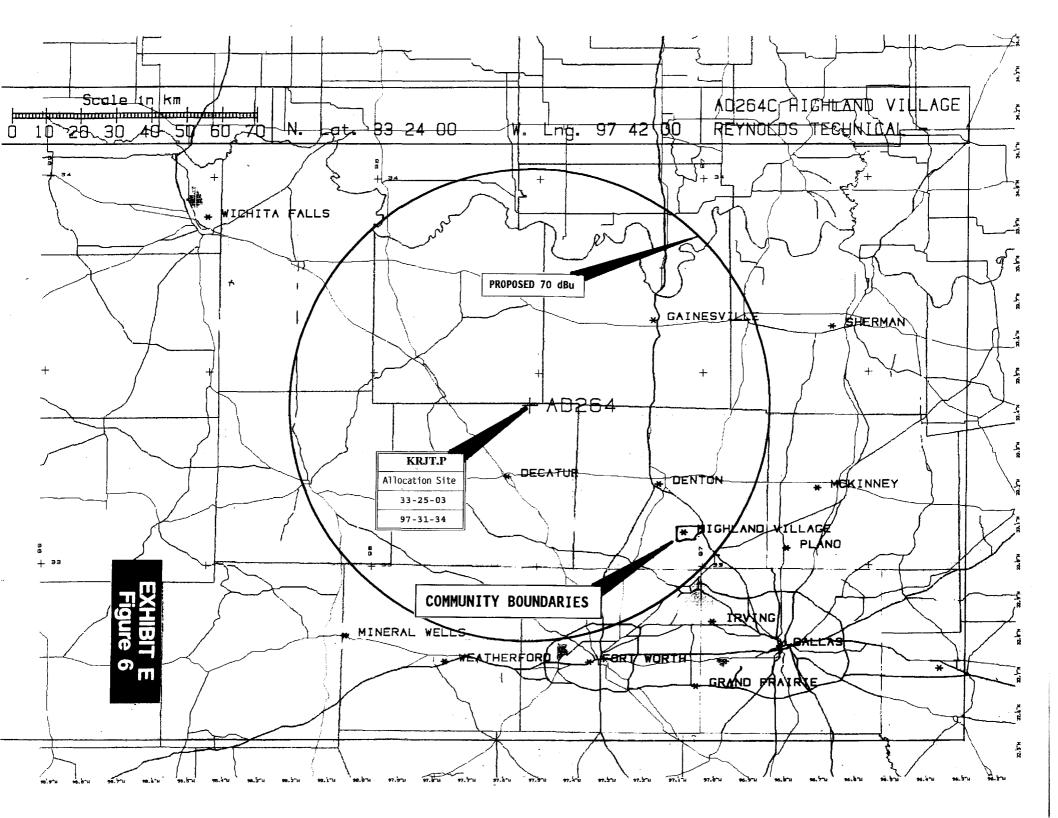
Gain -

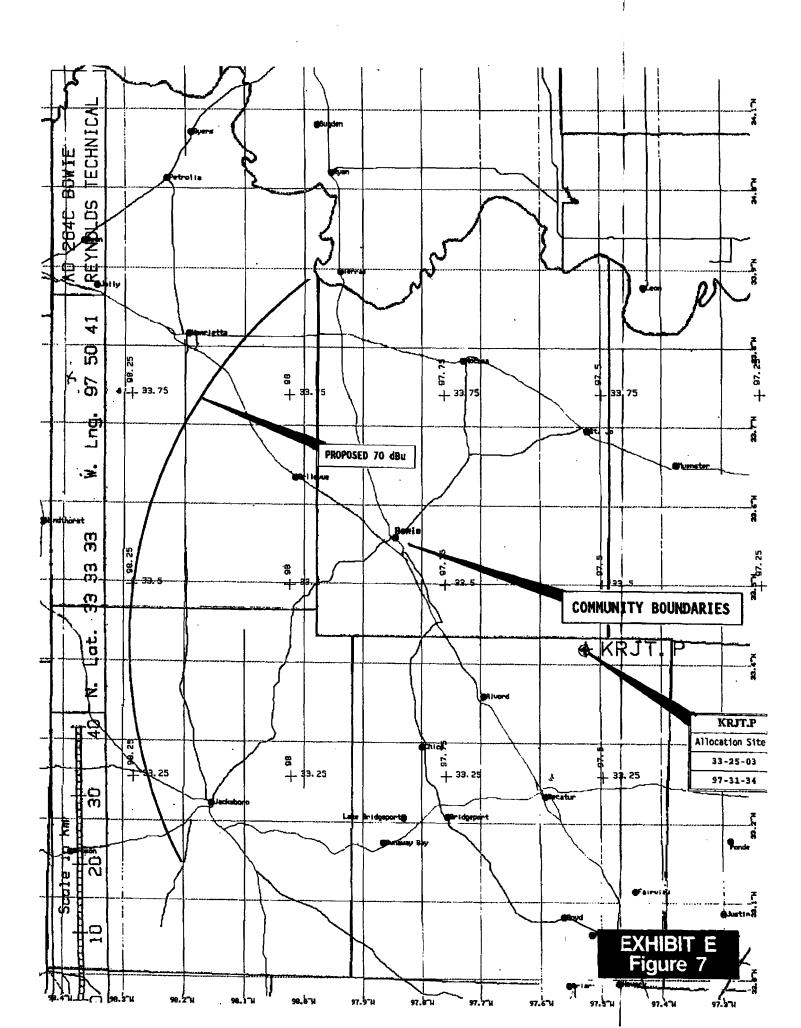
21,838.8

Loss -

NONE







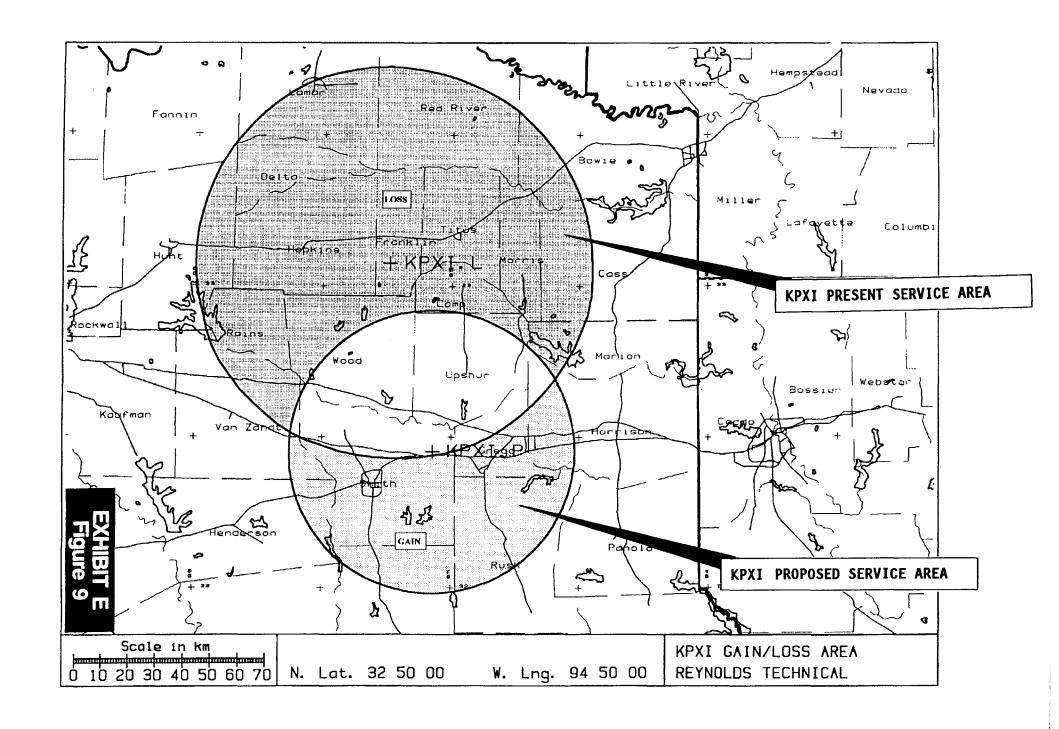
In Support of a

# **COUNTERPROPOSAL**

Channel 291A, Pauls Valley, OK
MM DOCKET 97-84, RM-9021
DYNAMIC BROADCASTING, INC.
EAST TEXAS BROADCASTING, INC.
BOWIE-NOCONA BROADCASTING COMPANY, INC.

# CHANNEL 264C2 @ OVERTON, TX - ALLOCATION STUDY [DEPICTING KPXI AS CLASS C2 WITH CHANGE IN COMMUNITY OF LICENSE] (ASSUMING DELETION OF 264C @ MOUNT PLEASANT)

27 09 04 23			Current Channel		spacing	js Miz		Search Dat 04-15-97
Call	Ch#	City	Chamier	State	Bear'	Dist'	R'qrd	Margin
Referenc North	e Coordina Latitude	Overton ates: : 32-16-32 : 94-58-20		TX	154.2	21.80		
_	n Class & Proposed	Mount Pl Community of in Instant	easant	TX	347.2	70.98	249.0	-178.02 *
Of No Co Modifica		Jasper		TX	147.1	189.66	190.0	-0.34 *
ALOPEN	262A	Tatum		ТX	117.1	55.00	55.0	0.00 *
Of No Co Propose & @ Cour Referenc Nort	oncern Upgraded oterpropos de Coordin n Latitude		City(Bow	ie)TX	295.0	253.15	249.0	4.15 *
KRMDFM	266C	Shrevepo	ort	LA	76.4	110.10	105.0	5.10 *
KRTXFM Of No Co Present of KRTX		Winnie Site		TX	168.9	271.25	249.0	22.25
AD264	264A	Natchito	ches	LA	110.4	206.19	166.0	40.19
KMVLFM	263C3	Madisonv	ville	ТX	209.3	170.47	117.0	53.47



## KPXI POP COUNTS (Present)

S	I	County	Co. Pop.	percent	Pop.	Total	
641	TX	Harrison	57483	8	4599		
558	TX	Bowie	81655	16	13065		
751	TX	Smith	151309	20	30262		
694	TX	Marion	9984	21	2097	•	
773	TX	Van Zandt	37944	23	8727		
573	TX	Cass	29982	25	7496		
655	ΤX	Hunt	64343	28	18016		
679	TX	Lamar	43949	35	15382		
631	TX	Gregg	104948	38	39880		
571	TX	Camp	9904	100	9904		
600	TX	Delta	4857	100	4857		
619	TX	Franklin	7802	100	7802		
651	TX	Hopkins	28833	100	28833		
711	TX	Morris	13200	100	13200		
729	TX	Rains	6715	100	6715		
769	TX	Upshur	31370	100	31370	242,205	KPXI (Lic)

## KPXI POP COUNTS (Proposed)

S	ΣI	County	Co. Pop.	percent	Pop.	Total
729	TX	Rains	6715	2	134	
641	TX	Harrison	57483	5	2874	
576	TX	Cherokee	41049	15	6157	
773	TX	Van Zandt	37944	18	6830	•
646	TX	Henderson	58543	20	11709	
740	TX	Rusk	43735	32	13995	
769	TX	Upshur	31370	75	23528	
751	TX	Smith	151309	100	151309	
631	TX	Gregg	104948	100	104948	321,484 KPXI (Alloc)

License (current) 242,205

Both cover 97,035 79,279 diff. (GAIN)

Loss within Lic. 145,170

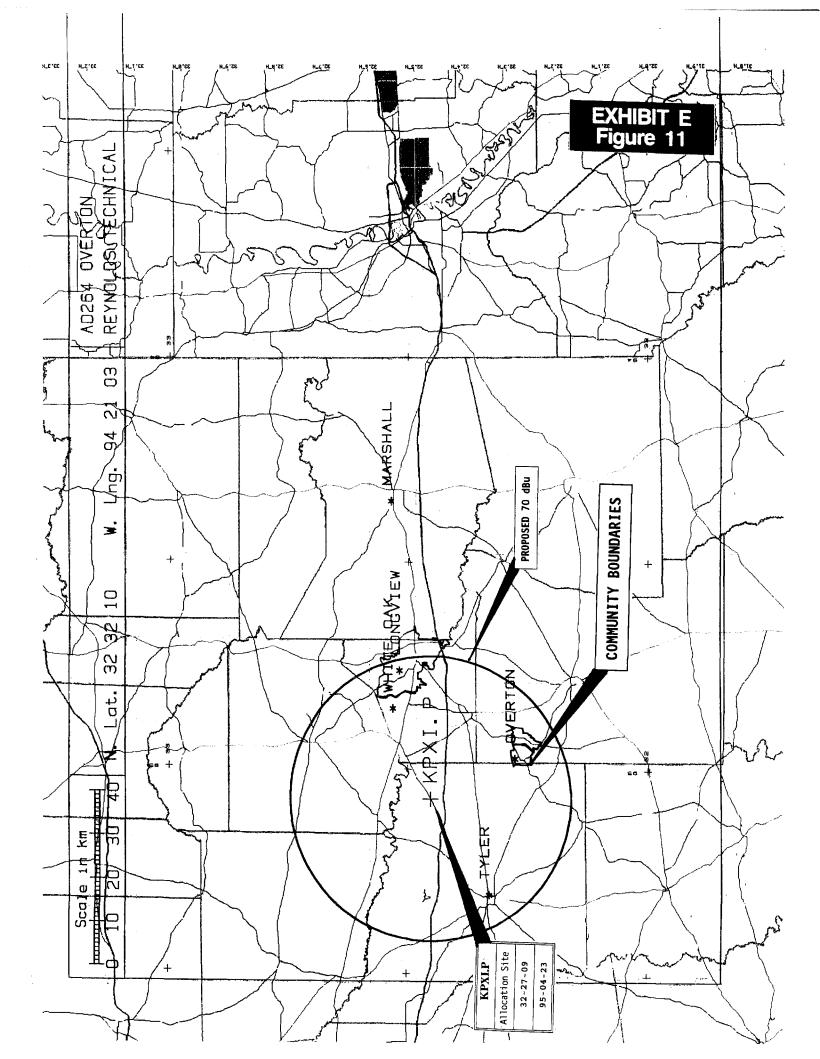
New (gain) 224,449

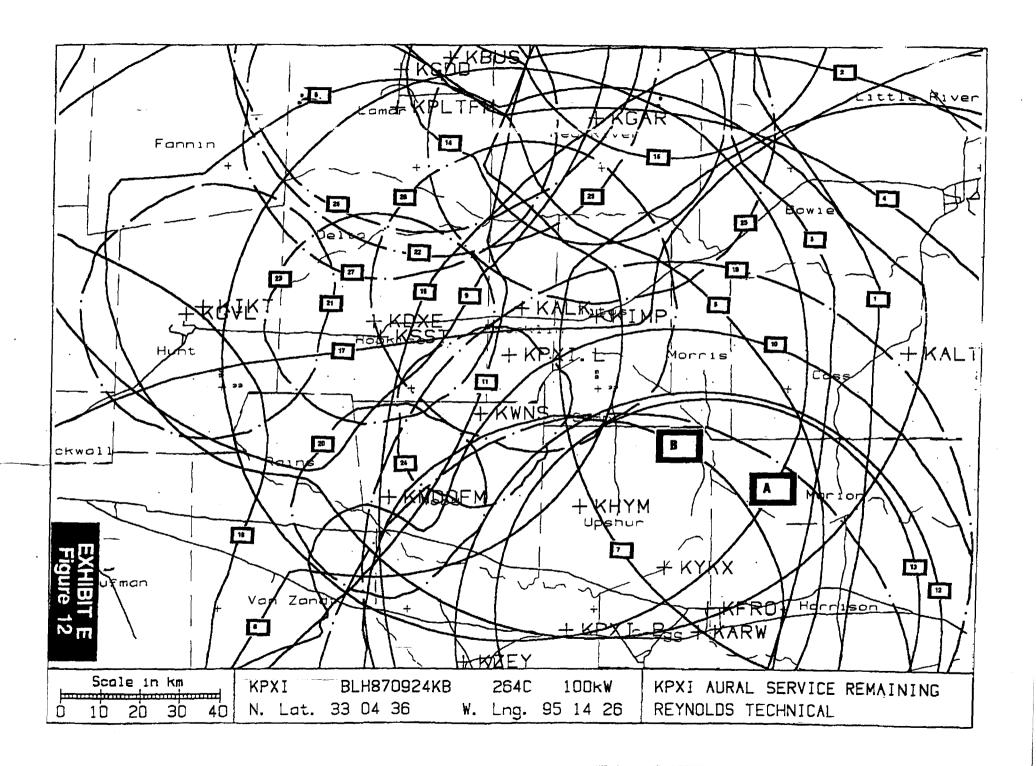
Land Area - Square Kilometers

Present - 16,460.7 Proposed - 8,560.3

Gain - NONE Loss - 7,900.4

> EXHIBIT E Figure 10





# KPXI REMAINING SERVICES STUDY [ALL STATIONS INCLUDED IN STUDY] (DEPICTING 5 REMAINING SERVICES IN ALL LOSS AREAS)

CALL BIGN	CITY OF <u>LICENSE</u>	ERP (KW)	ANTENNA\1 (meters/RMS)	SITE COORDINATES	CONTOUR No.
WBAP	FT. Worth	50.0	2810.82	32-36-38 97-10-00	1
KTBB	Tyle:, TX	5.0	674.73	32-16-18 95-12-23	2
KRLD	Dallıs	50.0	2788.05	32-53-25 96-38-44	3
кнум	Gilm⊖r, TX	10.0	1043.30	32-43-51 95-02-35	4
KDFX	Dalla;	50.0	2236.99	32 <b>-47-10</b> 96-57-00	5
KIMP	MT. Pleasant, TX	1.0	300.95	33-09-54 95-00-27	6
KALT	Atlanta, TX	1.0	299.34	33-04 <b>-</b> 53 94-10-56	7
KSST	Sulphur Springs	1.0	292.90	33-07-00 95-35-05	8
KGDD	Paris, TX	0.5	218.49	33-43-21 95-32-50	, <b>9</b>
KEZY	Tyler, TX	1.0	292.90	32-22-52 95-20-52	10
KGVL	Greenville, TX	1.0	305.78	33-10-02 96-05-55	11
KARW	Longview, TX	1.0	350.84	32-26-58 94-43-38	12
KFRO	Longview, TX	1.0	304.17	32-30-07 94-42-12	13
KCAR	Clarksdale, TX	0.410	220.78	33-36-47 95-01-03	14
KBEI	Ibabel, OK	1.0	271.98	33-52-54 94-49-10	15

Continued on next page

EXHIBIT E Figure 12B

## Continued from previous page

KWKH Shreveport, LA	50.0	2890.44	32-42-18 93-52-55	16
KEEL Shreveport, LA	50.0	2201.58	32-40-35 93-51-35	17
KLIF Dallas	5.0	732.25	32-56-40 96-59-25	18
KYKX Longv .ew, TX	100.0	352.0	32-35-37 93-51-35	19
KMOO Mineola, TX	3.0	91.00	32-45-04 95-33-18	20
KIKT Green/ille, TX	9.10	100.0	33-11-00 96-03-19	21
KGAP Clarksville, TX	50.0	94.00	33-36-40 95-01-03	22
KDXE Sulphur Springs	6.0	87.0	33-09-07 95-36-12	23
KWNS Winnsboro, TX	3.0	86.0	32-56-32 95-18-53	24
KBUS Paris TX	50.0	150.0	33-45-04 95-18-53	. 25
KOYN Paris. TX	50.0	150.0	33-49-36 95-27-49	26
KPLT Paris TX	35.0	92.0	33-38-07 95-33-14	27
KALK Winfield, TX	22.50	100.0	33-11-01 95-12-32	28

 $<sup>\</sup>$  All FM station antennae shown as HAAT (meters) and AM stations efficiency (RMS)

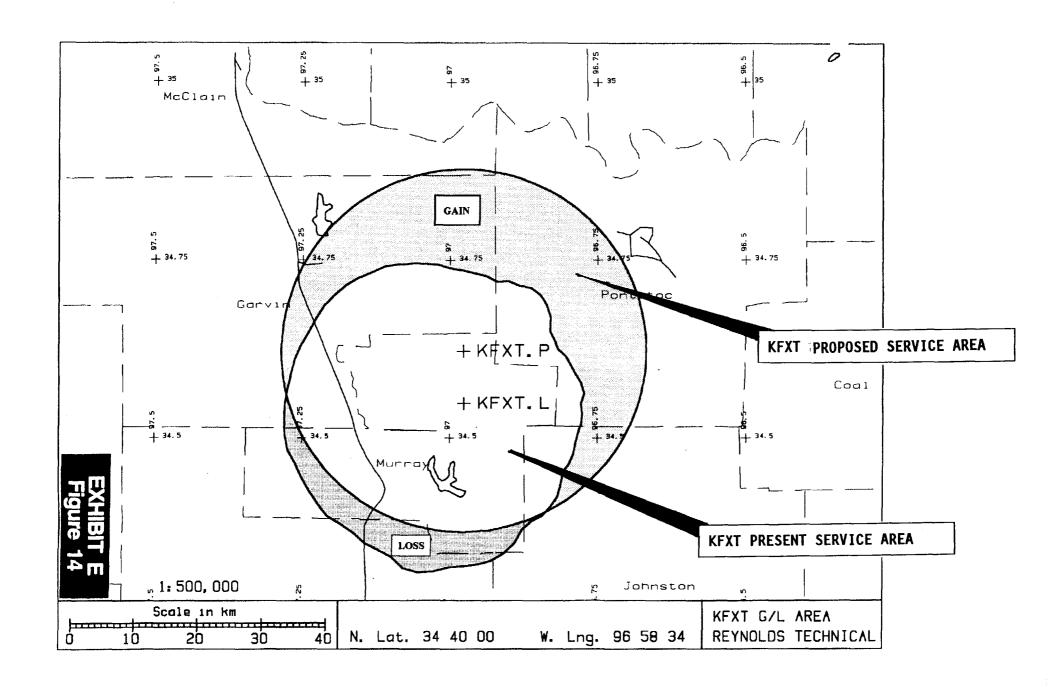
In Support of a

# COUNTERPROPOSAL

Channel 291A, Pauls Valley, OK
MM DOCKET 97-84, RM-9021
DYNAMIC BROADCASTING, INC.
EAST TEXAS BROADCASTING, INC.
BOWIE-NOCONA BROADCASTING COMPANY, INC.

# CHANNEL 291A @ SULPHUR - ALLOCATION STUDY [DEPICTING SEPARATIONS FOR CH 291 @ SULPHUR, OK] (FOR USE BY KFXT)

37 22 58 37			Current		spacing	gs MHz ———		Search D 04-15-9	ate 7
Call	Ch#	City	Channel		Bear'	Dist'	R'qrd	Margin	
Referenc North	ce Coordina h Latitude	<b>Sulphur</b> ates: : 34-30-24 : 96-58-37		OK	180.0	12.88	EXH Figu	IBIT E ure 13	-
	Instant Co	Pauls Val	_	OK	279.6	20.59	115.0	-94.41 *	ţ
KHKS	291C	Denton		TX	179.8	225.52	226.0	-0.48 *	¢
KIRC	290A	Seminole		oĸ	14.9	78.65	72.0	6.65 *	Ł
KGOU	292A	Norman		oĸ	334.8	81.75	72.0	9.75 *	k
KCMA.A	293C3	Holdenvil	.le	OK	52.2	52.69	42.0	10.69	
KQLL	291C	Owasso		ок	29.6	242.93	226.0	16.93	
KYNZ	294A	Lone Grov	<i>7</i> e	ок	210.0	49.57	31.0	18.57	
KCMA.C	293C3	Holdenvil	.le	ок	62.2	62.17	42.0	20.17	
ALOPEN	288C2	Coalgate		ок	96.4	83.53	55.0	28.53	
AP288	288C2	Coalgate		ок	97.4	87.06	55.0	32.06	
KKBI	291C2	Broken Bo	W	ок	101.7	205.96	166.0	39.96	
KCMA	293A	Holdenvi]	lle	ок	48.6	72.77	31.0	41.77	
KQTZ	290C	Hobart		ок	277.4	213.89	165.0	48.89	
ALOPEN	292C2	Wichita E	Falls	ТX	240.9	167.74	106.0	61.74	
KXXK	288A	Chickasha	a.	ок	296.2	97.37	31.0	66.37	



# SULPHUR POP COUNTS (Present)

	E	County	Co. Pop.	percent	Pop.	<u>Total</u>	
793	ОК	Carter	42919	2	858	}	
796	OK	Johnston	10032	5	502	<u> </u>	
795	OK	Garvin	26605	24	6385	5	
798	OK	Murray	12042	76	9152	2 16,897	KFXT Lic

# SULPHUR POP COUNTS (Proposed)

\$	ST.	County	Co. Pop.	percent	Pop.	Total
793 796 799 795 798	OK OK	Pontotoc Garvin	42919 10032 34119 26605 12042	2 8 30 30 5 40	803 10236 10642	
License (cum	ent)	16897	7			
Both cover		12682	2			15,235 diff. (GAIN)
Loss within Lic.		421	5			
New (gain)		19450	0			

Land Area - Square Kilometers

Present - 1,672.4 Proposed - 2,516.1

Gain - 843.7

Loss - NONE

EXHIBIT E Figure 15

